

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

**MOTION FOR PARTIAL JUDGMENT ON THE PLEADINGS OR TO STRIKE AS TO
GOOGLE LLC'S TENTH AND THIRTEENTH AFFIRMATIVE DEFENSES, OR IN
THE ALTERNATIVE, FOR A PROTECTIVE ORDER**

Pursuant to Federal Rules of Civil Procedure 12(c) and 12(f), Plaintiffs respectfully move for judgment on the pleadings as to defendant Google LLC's tenth and thirteenth affirmative defenses contained in its Answer at ECF No. 208, or to strike them. In the alternative, the United States moves pursuant to Federal Rule of Civil Procedure 26(c)(1) for a protective order forbidding Google LLC from seeking discovery from any party or non-party, related to those same defenses. The grounds for this motion are set forth in the accompanying memorandum of law. Two proposed orders, in the alternative, are attached.

Dated: August 18, 2023

Respectfully submitted,

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